



**SACK IP Law p.c.**

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June 9, 2022

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The request for an extension of Defendants' deadline to file opposing papers and the request to adjourn the preliminary injunction hearing are both GRANTED. The preliminary injunction hearing is rescheduled to June 28, 2022 at 10a.m. The parties are directed to use the Court's teleconference line at 888-251-2909, Access Code 2123101.

Pursuant to the accompanying Order, the request to extend the temporary relief granted at Dkt. No. 20 is GRANTED.

The request to extend the relief to the additional seller identified at Dkt. No. 21 is DENIED without prejudice. Plaintiff may file an amended complaint adding a party, and may then seek such relief.

Plaintiff is directed to serve a copy of this Order on the defendants.

Honorable Lewis J. Liman, U.S.D.J.  
United States District Court  
500 Pearl Street, Room 1620  
New York, NY 10007

SO ORDERED.

A handwritten signature in blue ink, appearing to read "L. Liman", is written over a horizontal line. Below the line, the text "LEWIS J. LIMAN" and "United States District Judge" is printed in a small, black, sans-serif font.

LEWIS J. LIMAN  
United States District Judge

Date: June 13, 2022  
New York, NY

Re: **Letter Motion Extension of the TRO Deadline and Adjournment of June 14 Hearing Date; HTT Group LLC v. The Individuals, Corporations, Limited Liability Companies, Partnerships, and Unincorporated Associations Identified on Schedule A; Case: 1:22-cv-04206-LJL**

Dear Judge Liman:

We represent the plaintiff, HTT Group LLC ("HTT Group") in this case. HTT Group has filed a motion for a Temporary Restraining Order under Seal on May 23, 2022, along with supporting Memorandum of Law Exhibits, the Declaration of Juno Yan and other documents in support of the Motion and a proposed Order to Show cause. In addition, as ordered in Doc. 17 dated May 23, 2022, as required by the Court, HTTP Group provided a clearer copy of Exhibit 2, showing images of infringing listings of products being marketed by the various defendants in larger and sharper form filed on May 24, 2022, as Doc. 18. Your honor granted the TRO and Issued an Order to Show Cause on June 2, 2022, Docs. [20] and [21] (collectively referred to as "the Order").

We write to inform the Court of the status of compliance with the Order and to respectfully request an extension of the TRO deadline and adjournment of hearing date. Specifically, we request:

1. A fourteen (14) day extension of Defendants' deadline to file opposing papers to Plaintiff's request for the issuance of a preliminary injunction, from June 9, 2022, to June 23, 2022;
2. A fourteen (14) day adjournment of the preliminary injunction hearing, from June 14, 2022, to June 28, 2022;

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3. An extension of the restraints imposed by the Order until the new hearing date pursuant to Rule 65(b)(2); and

4. An extension of the Order to the additional eBay Seller identified in the *SUPPLEMENTAL LETTER MOTION to Supplement TRO-Order to Show Cause*, and the attached Exhibit 1- *Schedule A Supplemental* filed on June 6, 2022; Doc. [21].

Plaintiff Requests the Extension for the Following Reasons:

Pursuant to the Order Plaintiff has sought but, with the exception of eBay.com, we have not yet received confirmation from the Financial Institutions that the asset restraint is complete and identifying information for Defendants.

Specifically, eBay.com has complied with the TRO, sending the required financial information earlier today. Amazon.com and Aliexpress.com have confirmed receipt of the Order and corresponded with us but have not yet complied.

This is the first extension and adjournment of these dates. No defendant has appeared in this matter.

**1. Extension of Deadline and Adjournment of Hearing Date**

Plaintiff served the online marketplace platforms Amazon.com, eBay.com and Aliexpress.com with the Order as early as June 3, 2022. However, while confirming receipt of the Order, with the exception of eBay.com, none of other online marketplaces have yet (i) confirmed that the asset restraint is complete, or (ii) provided contact information for Defendants sufficient to complete email service. In particular, Plaintiff has encountered some issues with Aliexpress, which is requiring Plaintiff to pay certain processing fees in order to begin processing the Order. Plaintiff is communicating with AliExpress and trying to resolve this issue amicably, including agreeing to pay the processing fee demanded by Aliexpress.

Therefore, to ensure Defendants can review and respond to Plaintiff's filings in a timely manner, while at the same time preserving the confidentiality of these proceedings until such time as the asset freeze occurs, we respectfully request the Court extend Defendants' deadline to respond to the Order from June 9, 2022, to June 23, 2022, and adjourn the preliminary injunction hearing from June 14, 2022, to June 28, 2022.

**2. Extension of Temporary Restraint**

The Temporary Restraining Order is currently set to expire on Wednesday, June 16, 2022. See Order, p. 8. As the Order pointed out, if the temporary restraints dissolve before Plaintiff can be heard on its preliminary injunction application, there is a substantial risk that Defendants will hide their assets and other relevant information before preliminary restraints can be imposed.

We respectfully submit that the foregoing constitutes "good cause" under Rule 65(b)(2) to extend the temporary restraints for a short period of time. Thus, to ensure that the relief provided in the Order is in

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fact effective, and to protect Plaintiff's rights pending the return date of the Order, we respectfully request that the Court continue the relief set forth in the Order until after the adjourned hearing date on Plaintiff's preliminary injunction application.

Defendants will not be unduly prejudiced by this request because a 14-day extension is reasonable, considering the slow response from the online platforms, despite Plaintiff's active and continued effort to obtain the email addresses from the platforms. Moreover, Plaintiff is requesting an adjournment of only fourteen (14) days, giving Defendants sufficient time to seek relief if there is any.

We would be happy to provide more information or to make ourselves available to discuss this matter further if necessary. We thank the Court for its time and attention to this matter.

Please call the undersigned, Local Counsel for Plaintiff, I (Alan M. Sack), should you have any questions or require supplementation of this Motion. I can be reached at 516.510.3061 (cell) or 212.500.1310

Additionally, if needed, plaintiff's Lead Counsel, Shengmao "Sam" Mu can be reached at 530-304-4560 or (917)-858-8018 (cell)

We are both available for a telephone conference, as convenient for the Court.

Accordingly, plaintiff respectfully requests that it be are granted the urgent relief requested in the enclosed Letter Motion Extension of the TRO Deadline and Adjournment of the June 14, 2021 Hearing Date.

Respectfully Submitted

**SACK IP Law p.c.**

A handwritten signature in blue ink, appearing to read "Alan M. Sack", enclosed in a rectangular box.

Alan M. Sack